

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AYANNA ROSENBERG, individually, and on
behalf of all those similarly situated,

Plaintiff,

v.

CCS COMMERCIAL, LLC, (d/b/a Credit
Collection Services Commercial), and
PROGRESSIVE DIRECT INSURANCE
COMPANY,

Defendants.

No. 2:17-cv-00476-MJP

**STIPULATED MOTION AND
~~PROPOSED~~ ORDER AMENDING
CASE SCHEDULE**

Pursuant to LCR 7(d)(1), LCR 10(g), and the Court's Chamber Procedures, Plaintiff Ayanna Rosenberg ("Plaintiff") and Defendants CCS Commercial, LLC and Progressive Direct Insurance Company (collectively, "Defendants"), by and through their counsel, hereby stipulate and move for a one-month continuance of the deadline for Plaintiff to file her motion for class certification and all related briefing and hearing deadlines, as follows.

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STIPULATED MOTION AND [PROPOSED] ORDER
AMENDING CASE SCHEDULE
No. 2:17-cv-00476-MJP

LAW OFFICES OF
COZEN O'CONNOR
A PROFESSIONAL CORPORATION
999 THIRD AVENUE
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STIPULATED MOTION

The parties agree and stipulate as follows:

The deadline to file Plaintiff's motion for class certification in this case has been set for December 14, 2017. (Minute Order Setting Trial Date and Related Dates, Dkt 22).

The parties are currently conducting discovery on class certification issues and are engaged in the meet and confer process regarding Plaintiff's outstanding discovery responses and document production. The parties believe that a one month continuance to file the motion for class certification will allow for proper resolution of their present discovery dispute, without disrupting the trial date of September 10, 2018 or the remaining case schedule.

Accordingly, the parties agree and stipulate that good cause exists to continue the deadline to file Plaintiff's Motion for Class Certification by approximately one month, to **January 18, 2017**. Pursuant to LCR 7(d)(3), Plaintiff shall note her motion for consideration on February 16, 2018, with Defendants' opposition briefs due on February 12, 2018, and Plaintiff's reply briefing due on February 16, 2018.

STIPULATED and AGREED:

Dated this 11th day of December, 2017

Dated this 11th day of December, 2017

TOUSLEY BRAIN STEPHENS PLLC

COZEN O'CONNOR

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*Attorneys for Plaintiff Ayanna Rosenberg,
individually, and on Behalf of all those
similarly situated*

*Attorneys for Defendant
CCS Commercial, LLC*

1 Dated this 8th day of December, 2017

Dated this 8th day of December, 2017

2 IDE LAW OFFICE

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6 *Attorney for Plaintiff Ayanna Rosenberg,*
7 *individually, and on Behalf of all those*
8 *similarly situated*

Attorneys for Defendant Progressive Direct
Insurance Company

ORDER

Pursuant to the above stipulated motion, and good cause appearing, it is so ordered that Plaintiff's motion for class certification be filed no later than January 18, 2018, and that the Case Schedule be amended as indicated.

DATED this 13 day of December, 2017.


The Honorable Marsha J. Pechman
United States District Judge